HAZARD COMMUNICATION PROGRAM

1 November 2005

HAZCOM Program Elements :

- The shop HAZCOM Program must have **ALL** of the following elements to be in compliance:
  - Instructions explaining how to readily access material safety data sheets (MSDSs)
  - Properly labeled hazardous chemical containers
  - A written HAZCOM plan for each workplace and shift including site-specific HAZCOM training
  - A current hazardous chemical inventory
  - Procedures for informing employees regarding hazards of non-routine tasks and unlabeled pipes

Material Safety Data Sheets:

- Material Safety Data Sheets (MSDSs) may be obtained from any of the following sources:
  - Current copies from the Robins AFB HMMS MSDS Web Search located at http://hp9.wr.disa.mil:8001/
    - Use designated computer(s) and printer(s)
    - Must include instructions for obtaining an MSDS at computer or designated personnel must be available
    - If the primary means of MSDS access is electronic, a back-up system must be established in case primary computer access is disrupted.
  - Current hard copies from shop's designated pharmacy or Bioenvironmental Engineering
  - Current hard copies from the product manufacturer
- MSDSs may be maintained in the shop in paper or electronic version; OSHA does not prohibit any form of access as long as "no barriers to immediate employee access" are created

Hazardous Materials Labeling:

All hazardous materials brought on base for use or redistribution must have labels with the required HAZCOM information as specified in 29 CFR 1910.1200(f).

EXCEPTIONS:

- Portable containers issued for one-time use
- Where the return of the unused portion is not mandatory for items used only during that work shift
  (e.g., some sealants)

Hazardous Materials Labeling (Cont):

- Labeling requirements:
  - Labels must have readable warning information including:
    - Chemical name (as it appears on the MSDS)
    - Name and address of the manufacturer
    - All appropriate health hazard warnings
      - Generally, manufacturer warning information is acceptable
  - A HMMS re-packaging label must be affixed to hazardous materials containers when:
    - Warning information is unreadable
    - Hazardous material is transferred to a secondary container not labeled with the chemical information
  - A HAZMAT Cell tracking label must be affixed to all hazardous material containers

Workplace Written HAZCOM Plan:

- Workplace Written HAZCOM Plan must include:
  - An explanation of how to access AFI 90-821, *Hazard Communication*, 30 March 2005
  - A **hard copy** of RAFBI 48-121, *Hazard Communication*, October 2002
  - An explanation of how to access Material Safety Data Sheets (MSDSs) for the items listed on the shop's hazardous chemical inventory (i.e., any chemical they use)
  - **Site-specific** HAZCOM training describing each process/task where hazardous materials are present/used and the complete list of hazardous materials associated with each process

Workplace Written HAZCOM Plan (Cont):

- A current inventory of each hazardous chemical known to be present in the work area/shop; must be cross-referenced to the identity on the MSDSs
- A list of all non-routine tasks involving hazardous materials and associated documentation
- A method to provide contractor employees who are exposed to hazardous chemicals while working in an Air Force work area/shop with the workplace written HAZCOM plan and access to MSDSs.
  - **Contractors are responsible for determining the adequacy of the HAZCOM information for assessments of contractor employees, and are responsible for their own HAZCOM program.**

Site-Specific HAZCOM Training:

- Workers must receive Site-Specific HAZCOM Training:
  - At the time of initial assignment to the work area and prior to working with a material that could potentially create a health hazard
  - When work area/shop conditions (PPE, exposure levels, controls, etc.) or hazardous materials change
  - When workers change work area/shops either by assigned duties or location

Site-Specific HAZCOM Training (Cont):

- Training plan must include the name(s) of the individual(s) providing the training
- Training plan must discuss:
  - The location and contents of the written HAZCOM plan
  - Labeling of hazardous materials
  - How to access and find information on an MSDS
  - Identification of hazard categories (e.g., flammability, carcinogenicity, etc.) or individual chemical hazards, especially OSHA Substance Specific chemicals
  - Routine tasks and their associated hazardous chemicals
  - Non-routine tasks and their associated hazards chemicals
  - Controls used to minimize exposures
  - Emergency procedures

Site-Specific HAZCOM Training (Cont):

- Refer to the *Control Summary Table* and other attachments from the current Bioenvironmental Engineering survey for specific control requirements
- Information on OSHA Substance Specific hazardous chemicals (e.g., asbestos, benzene, cadmium, formaldehyde, lead, etc.) may be obtained from Public Health or Bioenvironmental Engineering
- **Training plan must be reviewed and approved by Public Health, Bioenvironmental Engineering, the Base Safety Office, and the fire department prior to implementation in the work area/shop**

HAZCOM Training Documentation:

- The following training must be documented:
  - Initial supervisor/employee workplace site specific HAZCOM training
  - Additional supervisor/employee training whenever new hazards are introduced into the workplace or
  - External HAZCOM training provided to Air Force supervisors and employees from contractor organizations where applicable

- All training should be documented in either the:
  - Employee’s AF Form 55
  - Core Automated Maintenance System (CAMS)
  - Environmental, Safety, and Occupational Health Management Information System (ESOH-MIS)

Determining the Effectiveness of HAZCOM Training:

- Do workers understand the hazardous material labeling system, how to access an MSDS and find information on it, and the location of the HAZCOM training plan/binder?
- Do workers know what the physical and health hazards of the chemicals used in the workplace?
- Are workers aware of the methods used to detect the presence of hazardous chemicals (odor, appearance, etc.)?
- Do workers know what precautions they must take to protect themselves from exposure (PPE, work practices, emergency procedures, etc.)?

Determining the Effectiveness of HAZCOM Training (Cont):

- What are the limitations of the PPE (what will it protect them against and for how long)?
- What are the proper care and maintenance requirements of the PPE used?
- How should workers dispose of defective or damaged PPE?

Surveyors will question supervisors and workers during inspections to determine the effectiveness of the HAZCOM training and visually assess the condition of the PPE in use to verify that defective and damaged equipment is not being used.

Hazardous Chemical Inventory:

The Hazardous Chemical Inventory must include:

- Trade Name of chemical as it appears on the MSDS
- Manufacturer's name
- Manufacturer's part number and/or part number indicator
- National Stock Number (NSN) or Local Purchase Number
- Quantities used by the workplace per unit time (e.g., six ounces per shift, 1 gallon per hour, etc.)
- Purpose of chemical (task for which it is used)
- Disposal method (e.g., in process, DRMO, etc.)

Non-Routine Tasks:

- Non-routine tasks are those tasks included in a work area's normal activities but performed infrequently or, temporary duties outside an individual's normal Air Force Specialty Code (AFSC) or job series
  - The written HAZCOM plan must include technical orders (TOs), standard operating procedures (SOPs), and/or operating instructions (OIs) that describe non-routine tasks, their associated hazards, and controls.
  - If there are no non-routine tasks, the plan should contain a statement saying:

"There are NO non-routine tasks performed by employees in this shop."

References:

- RAFBI 48-121, Hazard Communication, October 2002
- AFI 90-821, Hazard Communication, 30 March 2005
- OSHA 29 CFR 1910.1200, Hazard Communication, 1 July 2001